KERN-TULARE Water District

April 24, 2019

Joshua Mahoney,
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

Re: Comments regarding the tentative Order for Hathaway, LLC, Kern-Tulare Water District, and Jasmin Ranchos Mutual Water Company

Dear Mr. Mahoney,

Thank you for the opportunity to provide comments on the Tentative Waste Discharge Requirements for the Jasmin Treatment Facility. Kern-Tulare Water District (Kern-Tulare) expresses its support for the adoption of this tentative Order which replaces the existing WDR Order No. 98-205 for Hathaway, LLC, Kern-Tulare, and Jasmin Ranchos Mutual Water Company. Kern-Tulare is committed to working in cooperation with the Regional Board to implement these requirements for the protection of our landowners who receive this water.

Blended produced wastewater used for irrigation in Kern-Tulare has been providing tangible benefits to both the energy and agricultural industries for over 40 years. Kern-Tulare serves 19,600 acres of high-value permanent crops in California's Central Valley and relies on imported water supplies from the Sacramento-San Joaquin Delta, the San Joaquin River, and the Kern River; however, the region is experiencing severe water shortages and groundwater overdraft. Due to increasing water supply uncertainty, Kern-Tulare has pursued projects such as this to reduce its reliance upon the Delta and work towards groundwater sustainability.

The new WDR will include the Guzman Reservoir which will assist Kern-Tulare by providing additional storage to more effectively blend produced water with water from the Friant-Kern Canal before being distributed to water users within the District. The resulting blended produced wastewater will deliver a sustainable and reliable water supply to irrigate approximately 3,700 acres of cropland, consisting primarily of citrus and pistachios. In particular, the additional storage provided by the Project improves operational flexibility and efficiency and helps to offset demand for local groundwater during the peak irrigation season.

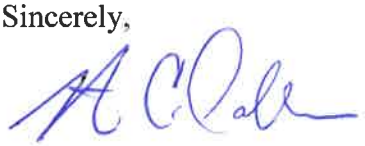
In addition to the long-term beneficial use of blended produced water, the tentative order stipulates important safeguards that will help assure existing groundwater quality is not negatively impacted, that the parameters of the Food Safety Expert Panel are met, and that environmental safety continues to be maintained. Analysis of the produced wastewater, and blended produced wastewater have consistently shown non-detect or detection limits **well below** the most stringent drinking water standards or at the lowest detection limit achievable by the laboratory. In addition

an anti-degradation analysis was conducted and found that groundwater quality at the project would not be significantly degraded, nor impact designated beneficial uses identified in the basin plan.

While Kern-Tulare generally supports Adoption of the WDR/MRP as proposed, the MRP states that groundwater quality sampling will need to occur quarterly for both Table I and Table II constituents. In addition, groundwater reporting must include a quarterly isoconcentration map for EC, chloride, and boron. Kern-Tulare is agreeable to administer quarterly groundwater monitoring and reporting for the previously mentioned items for the first year in order to demonstrate that groundwater in the area does not respond quickly to surface contaminants due to slow deep percolation. Kern-Tulare proposes adding a statement to the groundwater monitoring requirements that *"the shallow groundwater quality shall be monitored quarterly for a minimum of one year (4 quarters). If, at the end of at least four quarterly sampling events, the data shows minimal to no change in the constituent concentrations, the Dischargers may reduce the monitoring frequency for these constituents from quarterly to annually."* Since both groundwater flow and percolation through the unsaturated zone to groundwater are slow processes, we believe annual monitoring is appropriate because more frequent monitoring does not provide significant information on potential groundwater impacts.

This source of water continues to be an innovative solution to supplement the water supply that supports farming operations in Kern County and contributes towards Kern-Tulare's efforts of groundwater sustainability. Kern-Tulare appreciates the opportunity to comment on the tentative Order and hopes to continue this beneficial project and maintain compliance with the Regional Board through approval of the proposed Order. Thank you for your consideration.

Sincerely,



Steven C. Dalke
General Manager